

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF MISSISSIPPI

IN THE MATTER OF: ROOD JOSEPH  
ROMUS JOSEPH

CASE NO: 16-52194-KMS  
CHAPTER 13

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RESPONSE TO MOTION FOR RELIEF FROM STAY  
( DKT NO: 33 )

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COMES NOW, the Debtors, by and through their counsel, and files this Response to Capital One. In support of this motion the Debtors states as follows:

1. Debtors admit that Capital One Auto Finance was not included in previous Chapter 13 Plans, but state a new modified Chapter 13 Plan with treatment of Capitol One's collateral will be filed with Court.
2. Debtors requests that they be allowed to provide proof of insurance to Capitol One Auto Finance and modify their Chapter 13 Plan with treatment of Capitol One's collateral and that the Motion for Relief be denied.
3. Debtor prays for general relief.

This the 7<sup>th</sup> day of February, 2017.

Respectfully submitted,  
Rood and Romus Joseph  
/S/ William W. Stover, Jr.  
WILLIAM W. STOVER, JR MS BAR 8885  
ATTORNEY FOR DEBTORS

**CERTIFICATE OF SERVICE**

I, William W. Stover, Jr., undersigned Counsel, hereby certify that I have this day served electronically, a true and correct copy of the above Response to Motion for Relief:

United States Trustee:  
J.C. Bell, Trustee :  
Robert Byrd, Attorney for Capitol One

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rab@byrdwiser.com

This the 7<sup>th</sup> day of February, 2017.

/S/ WILLIAM W. STOVER, JR  
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